



U.S. Department of Justice

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January 30, 2018

VIA ECF

The Honorable Lynn Adelman
U.S. District Court
517 E. Wisconsin Ave.
Milwaukee, Wisconsin 53202

Re: *United States v. Shaimone Barkhadle*, Case No. 07-CR-15
Response from USA regarding Defendant's Request for Early
Release from Supervision

Dear Judge Adelman,

On January 4, 2018, Mr. Barkhadle moved this court for early termination of his supervised release and the United States was ordered to respond to this request no later than January 30, 2018. Please accept this letter as the requested response.

It is the United States position that Mr. Barkhadle's request should be denied at the present time. Mr. Barkhadle has made several representations to the court in his request; however, he has provided insufficient information to the United States to be able to access his request at this time. Many of the documents he provided in support of his request are incomplete, unsigned, or not what he claims they are. I have also contacted his probation officer, Mr. William Ostrenga who has informed me that Mr. Barkhadle did not provide him many of these documents, and only provided them to the United States. Many of the documents withheld by Mr. Barkhadle were required to be provided to the probation department as part of his supervision. Moreover, a cursory review of the partial bank records appear to suggest a very large income by Mr. Barkhadle. For example, his bank account states that he received \$200 in interest from his bank. The limited bank statements he has provided do not include any type of deposits that would merit such an interest payment. Moreover, according to Mr. Ostrenga, Mr. Barkhadle has refused to answer his probation officer's questions and requests for documentation regarding the claims he has asserted.

The United States respectfully requests that the court direct Mr. Barkhadle to provide full documentation to his probation officer and direct that Mr. Barkhadle provide the probation department with the necessary information so that both the United States and this court can fairly access Mr. Barkhadle's request for early termination of his supervision.

Sincerely,

GREGORY J. HAANSTAD
United States Attorney

By: /s/
KARINE MORENO-TAXMAN
Assistant United States Attorney

cc: USPO (William Ostrenga)